



March 7, 2014

**VIA ECF AND FACSIMILE (212-805-7986)**

**Vincent P. Pozzuto**

Direct Phone 212-908-1284

Direct Fax 866-591-9124

vpozzuto@cozen.com

Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

**Re: Stipulation to Extend Discovery Deadlines  
Schwartz v. Intimacy in New York et. al.  
Case No. 13-CV-5735**

Dear Honorable Judge Gardephe:

Pursuant to Rule 1D of Your Honor's Individual Rules of Practice, the parties have agreed upon consent to a stipulation to extend discovery deadlines. Attached is the joint stipulation signed by counsel for both parties.

The parties have agreed to the completion of fact discovery no later than June 26, 2014 and the completion of expert discovery no later than August 7, 2014. The previous deadline set by the Court required the completion of fact discovery no later than March 28, 2014 and the completion of expert discovery no later than May 9, 2014. The additional time is needed due to the voluminous document discovery Defendants need to review and then produce to comply with Plaintiff's discovery requests, as well as a number of depositions that need to be taken.

This is the first request for an extension of time of the discovery deadlines.

Thank you for your attention to this matter.

Respectfully yours,

COZEN O'CONNOR

By:  Vincent P. Pozzuto

VPP

Attachment

cc: Bryant T. Lamer, Esq.  
Shimshon Wexler, Esq.  
Robert L. Lash, Esq.

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